PHILIP MORRIS U.S.A. INTER-OFFICE CORRESPONDENCE
120 PARK AVENUE, NEW YORK, N.Y. 10017-5592

TO: Nancy Zimbalist DATE: August 24, 1992

FROM: David Rees Davies

SUBJECT: "Guess the Number of Tennis Balls" Contest

The attached draft of the "Guess the Number of Tennis Balls" Contest has been marked up to indicate the necessary revisions. Ms. Jan Durfee from the sweepstakes registration office of the New York Department of State, in an oral conversation, has advised that a contest of the type described contains an element of chance and should be registered and bonded with the State of New York.

New York General Business Law § 369-e requires that the following steps be taken:

1) File a copy of the rules, and a bond equal to the total value of the prizes offered, with the Secretary of State's office 30 days prior to the commencement of the contest, if the aggregate value of all prizes exceeds $5,000.

2) Post or publish the rules of the contest conspicuously and prominently at every location at which the opportunity is given in which to participate in the contest.

3) Within 90 days of completion of the contest, file with the Secretary of State's office a list of those winners of prizes in excess of $25.

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